UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

DONNY RATLIFF, individually and on behalf of all others similarly situated,

CASE NO: 4:15-CV-02376

Plaintiff,

JURY TRIAL DEMANDED

v.

PASON SYSTEMS USA CORP.,

FLSA COLLECTIVE ACTION

Defendant.

STIPULATION TO CONDITIONAL CERTIFICATION

Plaintiff Donny Ratliff and Defendant Pason Systems USA Corp. hereby stipulate to conditional certification of all Field Sales and Service Technicians employed nationwide, as outlined in Plaintiff's May 27, 2016 Motion. *See* ECF No. 24. Therefore, the Parties request the Court enter an Order granting conditional certification and requiring the Parties to submit the proposed Notice and Consent forms by June 29, 2016 to the Court.

Respectfully submitted,

By: /s/ Andrew W. Dunlap

Michael A. Josephson

Fed. Id. 27157

State Bar No. 24014780

Andrew W. Dunlap

Fed Id. 1093163

State Bar No. 24078444

Lindsay R. Itkin

Fed Id. 1458866

State Bar No. 24068647

FIBICH, LEEBRON, COPELAND,

BRIGGS & JOSEPHSON

1150 Bissonnet

Houston, Texas 77005

713-751-0025 – Telephone

713-751-0030 – Facsimile

mjosephson@fibichlaw.com

adunlap@fibichlaw.com

litkin@fibichlaw.com

AND

Richard J. (Rex) Burch

Texas Bar No. 24001807

BRUCKNER BURCH PLLC

8 Greenway Plaza, Suite 1500

Houston, Texas 77046

713-877-8788 – Telephone

713-877-8065 – Facsimile

rburch@brucknerburch.com

By: /s/ Donald L. Samuels

Donald L. Samuels

Texas State Bar #24005826

BRYAN CAVE LLP

1700 Lincoln St., Ste. 4100

Denver, CO 80203

Telephone: (303) 861-7000

Facsimile: (303) 866-0200

Donald.samuels@bryancave.com

AND

MITCHELL S. ALLEN

Texas Bar No. 01046800

Texas S.D. No. 2658932

BRYAN CAVE LLP

One Atlantic Center

1201 West Peachtree Street, NW

Suite 1400

Atlanta, Georgia 30309

Telephone: (404) 572-6600

Facsimile: (404) 572-6999

Mitchell.allen@bryancave.com

ATTORNEYS IN CHARGE FOR DEFENDANT

ATTORNEYS IN CHARGE FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served by ECF electronic filing on all known parties on June 21, 2016.

/s/ Andrew W. Dunlap
Andrew W. Dunlap

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with Counsel for Defendant and Defendant is agreed to this stipulation.

/s/ Andrew W. Dunlap
Andrew W. Dunlap